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Attorneys for Defendant
FRANCISCO MORA ALVAREZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO MORA ALVAREZ,

Defendant.

No. CR-08-0143 PJH (JCS)

REQUEST TO MODIFY THE
DEFENDANT'S ELECTRONIC
MONITORING CONDITIONS DUE TO
RECENT BIRTH OF HIS DAUGHTER

On May 22, 2008, the Court entered an order releasing defendant Francisco Mora Alvarez on a \$100,000 bond secured by property. The ordered release conditions include electronic monitoring. Mr. Alvarez is allowed to leave his residence for purposes of employment, medical appointment, attorney visits, and court appearances, with the prior approval of Pretrial Services.

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1 Mr. Alvarez now requests modification of his release conditions, due to the recent birth
2 of his child. On June 30th, Mr. Alvarez's significant other, Esmaralda Espinoza, gave birth to a
3 baby girl. Mr. Alvarez now requests permission to travel to San Jose, with the prior approval of
4 Pretrial Services, to visit Esmaralda and their baby. Mr. Alvarez's Pretrial Services Officer,
5 Jaime A. Carranza, has indicated that he does not oppose this request. We contacted Assistant
6 U.S. Attorney Nicole Kim, but are informed that she is out of the office until midday on July 1st.
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9 DATED: June 30, 2008

10 Bingham McCutchen LLP

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13 By: _____/s/
14 Haywood S. Gilliam, Jr.
15 Attorneys for Defendant
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